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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 *In re Ex Parte* Application of
PALANTIR TECHNOLOGIES INC.,

18 Applicant,

19 For an Order Pursuant to 28 U.S.C. § 1782 to
20 Obtain Discovery from MARC L.
21 ABRAMOWITZ for Use in Foreign
22 Proceedings.

CASE NO.: 3:18-mc-80132-JSC

**DECLARATION OF STEPHEN L.
WOHLGEMUTH IN SUPPORT OF
MARC L. ABRAMOWITZ'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 I, Stephen L. Wohlgemuth, hereby declare as follows:

2 1. I am an attorney at the law firm of Williams & Connolly LLP, which is counsel of
3 record for Marc L. Abramowitz (“Abramowitz”) in the above-captioned matter. I make this
4 declaration based on my own personal knowledge, and if called upon to do so, could and would
5 testify competently thereto. I make this declaration in support of Abramowitz’s Administrative
6 Motion to File Documents Under Seal.

7 2. Abramowitz submits this motion for an order to file under seal the confidential,
8 unredacted versions of the following documents:

- 9 • Portions of Abramowitz’s Opposition to Palantir Technologies Inc.’s (“Palantir”) *Ex*
10 *Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to
11 Obtain Discovery for use in Foreign Proceedings (“Opposition”);
- 12 • Portions of the Declaration of Stephen L. Wohlgemuth (“Wohlgemuth Opposition
13 Declaration”) in support of the Opposition;
- 14 • Entirety of Exhibits G and H of the Wohlgemuth Declaration.

15 3. The redacted portions of Abramowitz’s Opposition, the redacted portions of the
16 Wohlgemuth Opposition Declaration, and the entirety of Exhibits G and H to the Wohlgemuth
17 Opposition Declaration (“Sealed Documents”) discuss information relating to a Preferred Stock
18 Transfer Agreement from August 2012 (the “2012 Transfer Agreement”) that Palantir believes to
19 be confidential.

20 4. On September 6, 2018, I sent an email to counsel for Palantir to discuss whether
21 Palantir opposed Abramowitz’s public filing of the Sealed Documents. Palantir’s counsel
22 indicated that Palantir believes that the information in the Sealed Documents is confidential and
23 agreed to file the stipulation filed herewith.

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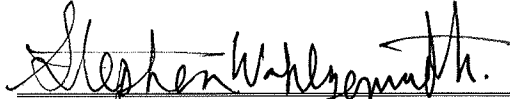
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

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4 Executed on September 7, 2018 in Washington, DC.

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6 Stephen L. Wohlgemuth
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